#### FLORENCE COPPER INC.



1575 W. Hunt Highway, Florence, Arizona 85132 USA

florencecopper.com

November 25, 2019

ADEQ Water Quality Compliance Section Mail Code 5415B-1 1110 West Washington Street Phoenix, Arizona 85007

Attention:

Mr. Tracy Bunch

Subject:

Weekly Monitoring Report for Week Ending 11/16/2019

Florence Copper, Production Test Facility

Aquifer Protection Permit No. 106360, LTF 61845

Dear Mr. Bunch:

Florence Copper is submitting this report in accordance with Table 4.1-8 and Section 2.7.4.4 of the Production Test Facility Temporary Aquifer Protection Permit (APP) No. 106360.

In accordance with Table 4.1-8 of the APP, this report includes In-Situ Best Available Demonstrated Control Technology (BADCT) compliance monitoring for the PTF that is required to be reported on a weekly basis including:

- Recovered volume to injection volume;
- Inward hydraulic gradient; and
- Maximum injection pressure.

A map showing the location of the PTF injection, recovery, and observation wells is included as Figure 1.

### Recovered Volume to Injection Volume

A summary of the injected and recovered volumes for the week of 11/10/2019 to 11/16/2019 is included in Table 1. The total injected and recovered volumes for the PTF as a daily total are also presented on Figure 2.

During the reporting period no exceedance of the alert level was measured for recovered volume to injected volume. The alert level is the recovered volume shall exceed the injected volume.

#### **Inward Hydraulic Gradient**

Table 2 includes a summary of water levels in the recovery and observation well pairs. Hydrographs showing the water level elevation for each recovery well and observation well pair are included in Figure 3.



During the reporting period, there was no exceedance of the alert level for the inward hydraulic gradient. The alert level for the inward hydraulic gradient is that the water level elevation in the paired observation well must be a minimum of 1 foot higher than the paired recovery well.

## **Injection Pressure**

A summary of the injection pressures during the reporting period is included as Table 3. As part of Florence Copper's focus on testing different wellfield operating strategies, injection well I-03 was operated as a recovery well from November 1-13. Injection at I-03 resumed on November 15.

During the reporting period no alert levels were exceeded for injection pressure, the injection pressure limit for the injection wells is limited by the fracture gradient of 0.65 pounds per square inch (psi) per foot. For the PTF injection wells this pressure limit equates to 104 psi.

Please contact me at 520-374-3984 if you require any additional information.

Sincerely,

Florence Copper Inc.

Richard Tremblay
Vice President Operations

Attachments:

**Tables and Figures** 

cc: Marybeth Greenslade, ADEQ

Nancy Rumrill, United States Environmental Protection Agency

# **TABLES**

Table 1. Injected and recovered volumes (gallons) for the week 11/03/2019 - 11/09/2019

Date	Daily Injection Flow	Daily Recovery Flow	Ratio PLS/Raff	% Recovery
11/10/2019	315800	384200	1.22	122
11/11/2019	315900	388000	1.23	123
11/12/2019	312400	385200	1.23	123
11/13/2019	310300	385400	1.24	124
11/14/2019	338200	387600	1.15	115
11/15/2019	333600	388400	1.16	116
11/16/2019	338800	387700	1.14	114
Weekly Average	323571	386643	1.19	119

Table 2. Average daily water levels in the recovery and observation well pairs (amsl)

Well Pairs Avg Elev.	11/10/19	11/11/19	11/12/19	11/13/19	11/14/19	11/15/19	11/16/19
R-01	1234.28	1233.12	1231.68	1230.77	1231.95	1233.17	1234.66
O-01	1242.82	1241.55	1240.13	1238.69	1240.12	1241.32	1242.82
0-07	1240.42	1239.32	1237.94	1236.95	1238.20	1240.00	1241.60
R-02	1223.59	1220.43	1219.57	1217.63	1218.00	1211.30	1212.57
O-01	1242.82	1241.55	1240.13	1238.69	1240.12	1241.32	1242.82
O-02	1241.30	1240.01	1238.57	1236.85	1238.55	1240.14	1241.77
R-03	1184.89	1181.74	1181.87	1180.88	1181.17	1181.08	1182.29
0-02	1241.30	1240.01	1238.57	1236.85	1238.55	1240.14	1241.77
O-03	1237.22	1235.85	1234.24	1232.86	1234.61	1239.38	1241.57
R-04	1184.19	1184.30	1184.30	1184.13	1184.27	1184.14	1184.30
O-03	1237.22	1235.85	1234.24	1232.86	1234.61	1239.38	1241.57
R-05	1179.42	1179.42	1179.42	1179.42	1179.42	1180.28	1182.06
O-04	1236.06	1234.79	1233.28	1232.57	1233.87	1237.64	1239,56
R-06	1180.53	1180.53	1180.53	1180.53	1180.53	1180.53	1180.53
O-04	1236.06	1234.79	1233.28	1232.57	1233.87	1237.64	1239.56
O-05	1236.78	1235.63	1234.12	1233.34	1234.53	1237.53	1239.34
R-07	1235.41	1234.33	1232.85	1231.72	1232.87	1235.46	1237.12
O-05	1236.78	1235.63	1234.12	1233.34	1234.53	1237.53	1239.34
O-06	1238.66	1237.52	1236.09	1235.20	1236.33	1238.60	1240.25
R-08	1229,55	1228.14	1226.76	1225.72	1226.23	1223.35	1224.95
O-06	1238.66	1237.52	1236.09	1235.20	1236.33	1238.60	1240.25
0-07	1240.42	1239.32	1237.94	1236.95	1238.20	1240.00	1241.60

Table 3. Injection well pressures (psi)

	I-01			I-02			I-03			1-04		
Date	AVG	MIN	MAX									
11/10/2019	0.00	0.00	0.00	0.00	0.00	0.00				0,00	0.00	0.00
11/11/2019	0.00	0.00	0.00	0.00	0.00	0.00				0.00	0.00	0.00
11/12/2019	0.00	0.00	0,00	0.00	0.00	0.00				0.00	0.00	0.00
11/13/2019	0.00	0.00	0.00	0.00	0.00	0.00				0.00	0.00	0.00
11/14/2019	0.00	0.00	0.00	0.00	0.00	0.00				0.00	0.00	0.00
11/15/2019	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
11/16/2019	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

I-03 was operated as a recovery well through 11/13/2019 as part of Florence Copper's focus on testing different wellfield operating strategies; injection resumed on 11/15/2019.

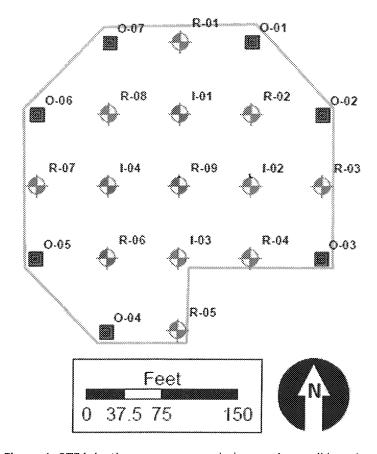


Figure 1. PTF injection, recovery, and observation well locations

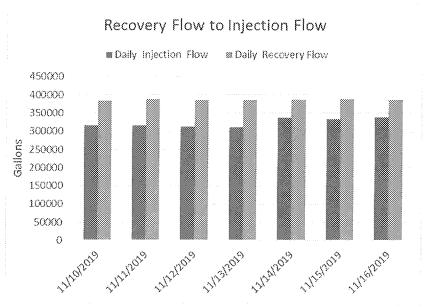


Figure 2. Recovered volume to injected volume

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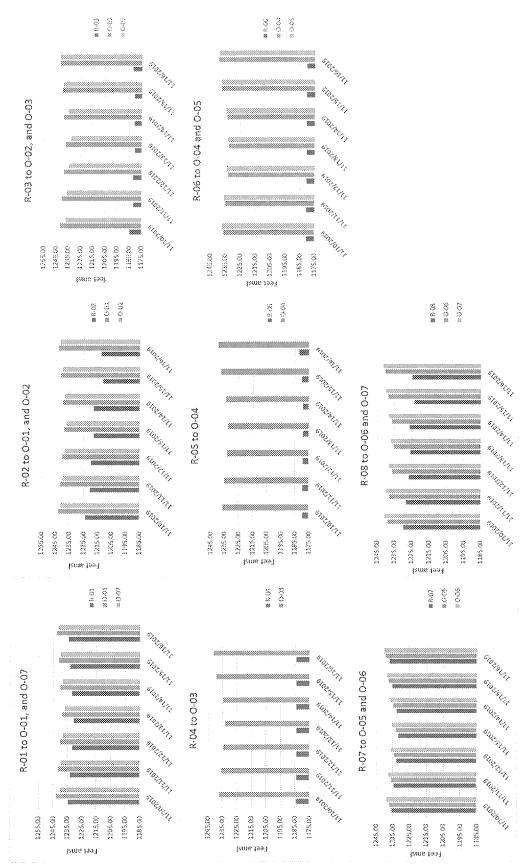


Figure 3. Recovery and observation well pairs